

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, Individually And On  
Behalf Of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., HASSAN  
AHMED, and STEPHEN NILL,

Defendants.

Case No.: C-04-10294 -DPW

Class Action

This Document Relates To:

**ALL RELATED ACTIONS.**

**BPI GLOBAL ASSET MANAGEMENT LLP'S  
MOTION FOR APPOINTMENT AS LEAD PLAINTIFF  
AND FOR APPROVAL OF CHOICE OF LEAD COUNSEL**

Proposed Lead Plaintiff BPI Global Asset Management LLP, by its counsel, hereby respectfully moves this Court to be appointed Lead Plaintiff in the consolidated securities class action and approve its selection and retention of Gold Bennett Cera & Sidener LLP as Lead Counsel.

In support of this Motion, BPI Global Asset Management LLP submits herewith a Memorandum of Law, the Declaration of Joseph M. Barton, and a Proposed Order.

DATED: April 9, 2004

Respectfully submitted,

**GRAHAM & ALBANO, P.C.**

By: Patricia S zumowski / by person

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**CERTIFICATE OF SERVICE**

I HERBY CERTIFY THAT A TRUE COPY OF THE ABOVE  
DOCUMENT WAS SERVED UPON THE ATTORNEYS OF  
RECORD FOR EACH OTHER PARTY  
BY MAIL(BY HAND) ON 7/9/2004

Patricia S zumowski / by person